

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation I Refs.

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation

Karl Oakes, J.D.

I. Property in Fish and Game

[Topic Summary](#) | [Correlation Table](#)

Research References

West's Key Number Digest

West's Key Number Digest, [Fish](#) 🔑 1, 2

West's Key Number Digest, [Game](#) 🔑 1, 2

A.L.R. Library

A.L.R. Index, Fish and Game

West's A.L.R. Digest, [Fish](#) 🔑 1, 2

West's A.L.R. Digest, [Game](#) 🔑 1, 2

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 1

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation
Karl Oakes, J.D.

I. Property in Fish and Game

§ 1. Property in fish and game, generally, ownership or title

[Topic Summary](#) | [Correlation Table](#) | [References](#)

West's Key Number Digest

West's Key Number Digest, [Fish](#)  1, 2

West's Key Number Digest, [Game](#)  1, 2

A.L.R. Library

[Validity, Construction, and Application of State Statutes Prohibiting, Limiting, or Regulating Fishing or Hunting in State by Nonresidents, 31 A.L.R.6th 523](#)

[Validity, Construction, and Application of Migratory Bird Treaty Act, 16 U.S.C.A. secs 703 to 712, and its Implementing Regulations, 3 A.L.R. Fed. 2d 465](#)

Whether there is a property interest in wildlife is a matter of state law.¹ As long as fish and game are in a state of freedom, and in particular before they are taken and reduced to possession, the right of ownership is considered common to all the people and cannot be claimed by any particular individuals.² In other words, the ownership of fish and game, so far as they are capable of ownership, until reduced to actual possession,³ at a time and in a manner permitted by law,⁴ is in the state.⁵ As long as a wild animal remains wild, unconfined, and undomesticated it belongs to the state and no individual property rights exist.⁶ At the same time though, the state has no such property interest in fish in a state of freedom as will support an action in trespass for monetary damages.⁷

The governmental power to regulate fishing and hunting is largely based on this public ownership, for the right of the individual to take title to fish and game is a qualified one in that it is a privilege granted by the state, and may be taken away or limited as the state sees fit.⁸ In regulating fisheries, the state is merely enacting legislation concerning its own property and prescribing the methods which may be used in acquiring it by private persons.⁹ Since fish are *ferae naturae* they are subject to ownership only by possession and control; no citizen has any right to fish nor to exclude any other citizen from equal opportunity to exercise their right to possession.¹⁰ Moreover, since ownership of game is in the state, individuals have no proprietary interest in illegally obtained or possessed game and state agents may take the illegally obtained game from possession of individuals without such taking constituting a confiscation of property.¹¹

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

Footnotes

- ¹ [State v. Butler](#), 587 So. 2d 1391 (Fla. 3d DCA 1991).
- ² [Bayside Fish Flour Co. v. Gentry](#), 297 U.S. 422, 56 S. Ct. 513, 80 L. Ed. 772 (1936).
- ³ [Madison Street Fishery, LLC v. Zehringer](#), 2017-Ohio-992, 86 N.E.3d 914 (Ohio Ct. App. 6th Dist. Erie County 2017).
- ⁴ [Elder v. Delcour](#), 364 Mo. 835, 269 S.W.2d 17, 47 A.L.R.2d 370 (1954) (fish in a stream).
- ⁵ [Madison Street Fishery, LLC v. Zehringer](#), 2017-Ohio-992, 86 N.E.3d 914 (Ohio Ct. App. 6th Dist. Erie County 2017).
- ⁶ [Arroyo v. State of California](#), 34 Cal. App. 4th 755, 40 Cal. Rptr. 2d 627 (2d Dist. 1995) (California law deems wild animals to be owned by people of state and wild game cannot be confined to private lands); [Nicholson v. Smith](#), 986 S.W.2d 54 (Tex. App. San Antonio 1999).
As to qualified interest of property owners in game on their property, see § 5.
As to fish in private waters, see § 6.
As to hunting and fishing rights of landowners, see § 20.
- ⁷ [Com. v. Agway, Inc.](#), 210 Pa. Super. 150, 232 A.2d 69 (1967).
- ⁸ [State ex rel. Visser v. State Fish and Game Commission](#), 150 Mont. 525, 437 P.2d 373 (1968).
- ⁹ [Washington Kelpers Ass'n v. State](#), 81 Wash. 2d 410, 502 P.2d 1170 (1972) (abrogated on other grounds by, [Yim v. City of Seattle](#), 194 Wash. 2d 682, 451 P.3d 694 (2019)).
As to regulation of fishing and hunting by the state, see §§ 30 to 34.
- ¹⁰ [Tlingit and Haida Indians of Alaska v. U. S.](#), 182 Ct. Cl. 130, 389 F.2d 778 (1968).
- ¹¹ [Aikens v. State Dept. of Conservation](#), 387 Mich. 495, 198 N.W.2d 304 (1972); [State v. Pollock](#), 914 S.W.2d 1 (Mo. Ct. App. W.D. 1995).

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 2

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation
Karl Oakes, J.D.

I. Property in Fish and Game

§ 2. What are fish and game

[Topic Summary](#) | [Correlation Table](#) | [References](#)

West's Key Number Digest

West's Key Number Digest, [Fish](#)  2

West's Key Number Digest, [Game](#)  2

Fish and game are generally animal life which are *ferae naturae* or wild¹ and are distinguished from domesticated animals,² as well as animals held in captivity.³ Thus, a fox is a “wild animal” within the meaning of a state statute applying to game.⁴ Lobsters are animals *ferae naturae*, and those which inhabit the public waters of the state are the common property of the people of the state until caught, at which time they belong to the captor.⁵

For purposes of regulating their taking, some forms of marine life may be distinguished based on their nature, such as clams, mussels, and other sedimentary or burrowing mollusks which are not “wild.”⁶ Moreover, a “unit of marine life,” within the meaning of a statute defining the penalty for taking, harvesting, or possession of an endangered or threatened species, did not include marine turtle eggs since turtle eggs were not fish, salt water products, shell fish or live specimens.⁷

Only the legislature may designate a species of animal as game.⁸

While privately held animals kept in captivity are distinguished from wildlife or game, if they are released into the wild or allowed to roam away from captivity, and by nature they are wild, they may regain their status as an animal *ferae naturae*.⁹ Thus, while an unqualified property right in wild animals may arise when they are legally removed from their natural liberty and made subjects of man's dominion, that right is lost if the animal regains its natural liberty.¹⁰ However, a domestic animal escaping from its corral onto public lands does not become a “wild free-roaming animal.”¹¹

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

Footnotes

¹ [Bayside Fish Flour Co. v. Gentry](#), 297 U.S. 422, 56 S. Ct. 513, 80 L. Ed. 772 (1936).
As to definitions and classifications of animals, generally, see [Am. Jur. 2d, Animals](#) §§ 1, 2.

² [Dieterich v. Fargo](#), 194 N.Y. 359, 87 N.E. 518 (1909).

§ 2. What are fish and game, 35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 2

- ³ Wiley v. Baker, 597 S.W.2d 3 (Tex. Civ. App. Tyler 1980).
- ⁴ Barbour Fur Co., Inc. v. North Carolina Wildlife Resources Commission, 40 N.C. App. 609, 253 S.E.2d 323 (1979).
- ⁵ State v. Kofines, 33 R.I. 211, 80 A. 432 (1911).
- ⁶ U.S. v. Long Cove Seafood, Inc., 582 F.2d 159 (2d Cir. 1978).
- ⁷ Bivens v. State, 586 So. 2d 442 (Fla. 4th DCA 1991).
- ⁸ Michigan Audubon Soc. v. Natural Resources Com'n, 206 Mich. App. 1, 520 N.W.2d 353 (1994).
- ⁹ Wiley v. Baker, 597 S.W.2d 3 (Tex. Civ. App. Tyler 1980).
As to property rights in wild animals, generally, see Am. Jur. 2d, Animals §§ 11 to 15.
- ¹⁰ State v. Bartee, 894 S.W.2d 34 (Tex. App. San Antonio 1994).
- ¹¹ U.S. v. Christiansen, 504 F. Supp. 364 (D. Nev. 1980).

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 3

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation
Karl Oakes, J.D.

I. Property in Fish and Game

§ 3. Fish and game reduced to possession

[Topic Summary](#) | [Correlation Table](#) | [References](#)

West's Key Number Digest

West's Key Number Digest, [Fish](#)  1, 2

West's Key Number Digest, [Game](#)  1, 2

Fish and game lawfully reduced to possession generally become the property of the person in lawful possession,¹ subject to state regulation.² Since the ownership of fish and game is in the first instance lodged in the people of the state, it may be reserved by them, or they may permit individuals to acquire ownership of, or title to, such as is reduced to possession, subject to such conditions and limitations as the people, acting through their legislative agents, may, within constitutional limits, wish to impose.³ Thus, ownership of wild animals remains in the state and is not subject to private ownership except as may be provided by state law,⁴ and generally there is no individual property or ownership in fish or game so long as they remain wild, unconfined, and in a state of nature.⁵ However, as soon as fish or game are reduced to the possession of a fisherman or hunter lawfully taking them, their ownership passes to the possessor.⁶ Conversely, one can acquire no title to fish or game which have been caught or taken unlawfully, and even if taken lawfully, one cannot convey title if such sale is prohibited by statute.⁷ Thus, all wildlife belongs to the state until taken and possessed in compliance with the law and only then does it belong to its captor.⁸

Fish belong to the state and commercial fishermen may acquire only such right to possession or ownership of fish as the state may allow; thus, for such fishermen to be in lawful possession of the fish, it is imperative that they comply with the regulations which the state has promulgated under the authority of its police power.⁹ If a person, after capturing fish, confines them in a private pond disconnected from public waters, he or she acquires an absolute property in them subject to be divested only by their escape.¹⁰ A fisherman need not withdraw the fish from the water in order for his or her private ownership to attach. If he or she encloses fish in a net from which he or she may take them at his or her pleasure, and from which it is practically, but not absolutely, impossible for them to escape, he or she has acquired a title in them.¹¹

In the absence of a statute to the contrary, if one obtains ownership of wild game by capture and confinement, for so long as the animal is kept confined ownership is not dependent on domesticating the animal.¹² If the animal escapes from the possessor's control, the title is lost and ownership of the state in the animal is resumed.¹³

The pursuit of game gives no title thereto. Consequently, unless a hunter mortally wounds wild game or has it in such a situation that its escape is improbable, if not impossible, no action will lie against another who takes or kills game in front of such hunter after he or she has wounded and pursued it.¹⁴

§ 3. Fish and game reduced to possession, 35A Am. Jur. 2d Fish, Game, and Wildlife...

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

Footnotes

- ¹ Department of Natural Resources v. Keating, 238 Ga. 605, 234 S.E.2d 519 (1977); Madison Street Fishery, LLC v. Zehringer, 2017-Ohio-992, 86 N.E.3d 914 (Ohio Ct. App. 6th Dist. Erie County 2017) (fish).
- ² Department of Natural Resources v. Keating, 238 Ga. 605, 234 S.E.2d 519 (1977).
- ³ State v. Pollock, 42 S.D. 360, 175 N.W. 557 (1919).
- ⁴ Bilida v. McCleod, 211 F.3d 166 (1st Cir. 2000) (applying Rhode Island law); State ex rel. Visser v. State Fish and Game Commission, 150 Mont. 525, 437 P.2d 373 (1968).
- ⁵ U.S. v. Long Cove Seafood, Inc., 582 F.2d 159 (2d Cir. 1978).
- ⁶ Dapson v. Daly, 257 Mass. 195, 153 N.E. 454, 49 A.L.R. 1496 (1926); Council v. Sanderlin, 183 N.C. 253, 111 S.E. 365, 32 A.L.R. 1527 (1922).
- ⁷ People v. Monterey Fish Products Co., 195 Cal. 548, 234 P. 398, 38 A.L.R. 1186 (1925).
- ⁸ Department of Natural Resources v. Keating, 238 Ga. 605, 234 S.E.2d 519 (1977).
- ⁹ Aikens v. Conservation Dept., 28 Mich. App. 181, 184 N.W.2d 222 (1970), judgment rev'd on other grounds, 387 Mich. 495, 198 N.W.2d 304 (1972).
- ¹⁰ Murphy v. Hitchcock, 22 Haw. 665, 1915 WL 1421 (1915).
- ¹¹ State v. Shaw, 67 Ohio St. 157, 65 N.E. 875 (1902).
- ¹² Schultz v. Morgan Sash & Door Co., 1959 OK 149, 344 P.2d 253, 74 A.L.R.2d 967 (Okla. 1959).
- ¹³ Koop v. U.S., 296 F.2d 53 (8th Cir. 1961).
As to the effect of escape of wild animals from confinement, generally, see [Am. Jur. 2d, Animals § 15](#).
- ¹⁴ Dapson v. Daly, 257 Mass. 195, 153 N.E. 454, 49 A.L.R. 1496 (1926).

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 4

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation
Karl Oakes, J.D.

I. Property in Fish and Game

§ 4. Effect of location of fish and game on ownership thereof

[Topic Summary](#) | [Correlation Table](#) | [References](#)

West's Key Number Digest

West's Key Number Digest, [Fish](#)  1, 2

West's Key Number Digest, [Game](#)  1, 2

The state, in its sovereign capacity, owns the fish in tidewaters within its jurisdiction,¹ and its coastal waters,² as well as fish and game in its navigable waters, and the state's ownership extends to fish in all waters of which the underlying lands are not in private ownership.³ In some jurisdictions, statutes reflecting the common-law principle that fish which are *ferae naturae* are the property of the state do not apply to fish located in bodies of water that are totally within private property and totally separate from any other body of water, in which the owner of property owns fish therein.⁴

A state does not have an exclusive legal right to the anadromous fish hatched in its waters as opposed to the rights of the other states sharing the same waterways. The state does have an equitable right to a fair distribution of this important resource in relation to the other states, since at the root of the doctrine of equitable apportionment is the principle that a state may not preserve solely for its own inhabitants natural resources located within its borders, and consistent with this principle, the states have an affirmative duty under the doctrine to take reasonable steps to conserve and even augment the natural resources within the borders for the benefit of the other states.⁵ Since the ownership of fish is in the state in trust for all its people, a municipality cannot claim, for the benefit of that portion of the people of the state constituting such municipality's inhabitants, any proprietary interest in the fish within the limits of the municipality.⁶

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

Footnotes

¹ [Dodgen v. Depuglio](#), 146 Tex. 538, 209 S.W.2d 588 (1948).

² [People v. Brady](#), 234 Cal. App. 3d 954, 286 Cal. Rptr. 19 (1st Dist. 1991).

³ [Shaughnessy v. PPG Industries, Inc.](#), 795 F. Supp. 193 (W.D. La. 1992); [Tyrrell Gravel Co. v. Carradus](#), 250 Ill. App. 3d 817, 189 Ill. Dec. 318, 619 N.E.2d 1367 (2d Dist. 1993); [Com. v. Tart](#), 408 Mass. 249, 557 N.E.2d 1123 (1990).

⁴ [Tyrrell Gravel Co. v. Carradus](#), 250 Ill. App. 3d 817, 189 Ill. Dec. 318, 619 N.E.2d 1367 (2d Dist. 1993).

For discussion of fish in private waters, see § 6.

⁵ [Idaho ex rel. Evans v. Oregon](#), 462 U.S. 1017, 103 S. Ct. 2817, 77 L. Ed. 2d 387 (1983).

⁶ [Ex parte Bailey](#), 155 Cal. 472, 101 P. 441 (1909).

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 5

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation
Karl Oakes, J.D.

I. Property in Fish and Game

§ 5. Qualified interest of property owners in fish and game

[Topic Summary](#) | [Correlation Table](#) | [References](#)

West's Key Number Digest

West's Key Number Digest, [Fish](#)  1, 2

West's Key Number Digest, [Game](#)  1, 2

Wild game within a state is not the subject of private ownership, except in so far as the people may elect to make it so.¹ Status as the owner of land upon which animals *ferae naturae* are found is insufficient to confer individual property rights to the animals thereon.² Thus, landowners cannot claim a property interest in wild animals on their property.³ Under the public trust doctrine, an animal must be legally removed from the wild before property rights can arise in it.⁴ However, even though the title to fish and game is in the state in trust for the benefit of its citizens, the owner of premises whereon game is located has a qualified property interest in such game;⁵ without his or her permission no other person can go upon those premises and take the game.⁶ That is, the owner has a right to control and protect the game on his or her lands, subject to such regulations as may be made by the state.⁷ Thus, while wild animals belong to all citizens of the state, they are also subject to interests in the nature of private ownership arising from ownership of the land on which they are found, such that one who owns land may hunt the game thereon; this private ownership does not conflict with the state's ownership, but must yield to the state's regulations.⁸

The conveyance of a hunting or fishing right cannot transfer ownership of wildlife. As the state owns the fish and game; a conveyance of hunting and fishing rights by property owners merely conveys a right to enter upon land for that purpose, which rights are normally classified as "profit a prendre."⁹

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

Footnotes

¹ [Bailey v. Smith](#), 581 S.W.3d 374 (Tex. App. Austin 2019), review denied, (Oct. 2, 2020).

² [Betchart v. Department of Fish & Game](#), 158 Cal. App. 3d 1104, 205 Cal. Rptr. 135 (1st Dist. 1984); [Nicholson v. Smith](#), 986 S.W.2d 54 (Tex. App. San Antonio 1999).

³ [Clajon Production Corp. v. Petera](#), 854 F. Supp. 843 (D. Wyo. 1994), *aff'd* in part, appeal dismissed in part, 70 F.3d 1566 (10th Cir. 1995).

⁴ [Bailey v. Smith](#), 581 S.W.3d 374 (Tex. App. Austin 2019), review denied, (Oct. 2, 2020).

⁵ [Mille Lacs Band of Chippewa Indians v. State of Minn.](#), 152 F.R.D. 587 (D. Minn. 1993).

⁶ § 20.

⁷ [McKee v. Gratz](#), 260 U.S. 127, 43 S. Ct. 16, 67 L. Ed. 167 (1922).

⁸ [Nelson v. State](#), 318 Ark. 146, 883 S.W.2d 839 (1994).
As to regulation of hunting and fishing, see §§ 30 to 34.

⁹ [Mille Lacs Band of Chippewa Indians v. State of Minn.](#), 861 F. Supp. 784 (D. Minn. 1994), *aff'd*, 124 F.3d 904 (8th Cir. 1997), judgment *aff'd*, 526 U.S. 172, 119 S. Ct. 1187, 143 L. Ed. 2d 270 (1999).
As to rights of landowners and acquisition of rights, see §§ 20 to 23.

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 6

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation

Karl Oakes, J.D.

I. Property in Fish and Game

§ 6. Ownership of fish in private waters

[Topic Summary](#) | [Correlation Table](#) | [References](#)

West's Key Number Digest

West's Key Number Digest, [Fish](#)  1, 2

An owner's exclusive right to fish waters within the boundaries of the land owned is distinguishable from the ownership of fish within those waters; thus, it has been held that notwithstanding such exclusive right to fish there is no private ownership except as to those fish lawfully reduced to the land owner's possession.¹ In some jurisdictions, however, the landowner is deemed to own fish located in bodies of water that are totally within the private property and totally separate from any other body of water.² Thus, while generally the state owns the fish in all the waters within the state, private ponds which are privately stocked and not connected with public waters are an exception and those fish are the property of the respective property owner.³

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

Footnotes

¹ [State v. Southern Coal & Transp. Co.](#), 71 W. Va. 470, 76 S.E. 970 (1912).

² [Tyrrell Gravel Co. v. Carradus](#), 250 Ill. App. 3d 817, 189 Ill. Dec. 318, 619 N.E.2d 1367 (2d Dist. 1993).

³ [Ex parte Fritz](#), 86 Miss. 210, 38 So. 722 (1905).

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.

35A Am. Jur. 2d Fish, Game, and Wildlife Conservation § 7

American Jurisprudence, Second Edition | May 2021 Update

Fish, Game, and Wildlife Conservation
Karl Oakes, J.D.

I. Property in Fish and Game

§ 7. Shellfish distinguished from fish for purposes of property rights

[Topic Summary](#) | [Correlation Table](#) | [References](#)

West's Key Number Digest

West's Key Number Digest, [Fish](#)  1, 2

West's Key Number Digest, [Game](#)  1, 2

The difference between the locomotive powers of swimming fish and shellfish, such as oysters and clams, justifies the law in making a distinction as to their ownership.¹ In their natural state, clams and oysters are classified as *ferae naturae*, and their ownership is vested in the state in its sovereign capacity,² but when planted where they do not naturally grow, in locations marked by posts or otherwise, they are classified as domestic animals and are the subjects of private ownership, although their owner has no greater actual possession than is evidenced by their planting and staking.³ In the latter case, they may be the subject of larceny,⁴ and if one injures or converts such shellfish, he or she is liable to respond in damages.⁵

Musselshells are the property of the owner of the land on which they are found in nonnavigable waters, although a statute declares that the title to fish and game is in the state.⁶

© 2021 Thomson Reuters. 33-34B © 2021 Thomson Reuters/RIA. No Claim to Orig. U.S. Govt. Works. All rights reserved.

Footnotes

¹ [U.S. v. Long Cove Seafood, Inc.](#), 582 F.2d 159 (2d Cir. 1978).

² [People v. Morrison](#), 194 N.Y. 175, 86 N.E. 1120 (1909).

³ [Union Land Associates v. Ussher](#), 174 Or. 453, 149 P.2d 568 (1944).

⁴ [U.S. v. Long Cove Seafood, Inc.](#), 582 F.2d 159 (2d Cir. 1978) (unlike most wild animals, clams, mussels and other sedimentary or burrowing mollusks are deemed to be in possession of owner, if any, of land in which they are found, and taking them without permission of owner is larceny under state law); [J. H. Miles & Co. v. McLean Contracting Co.](#), 180 F.2d 789 (4th Cir. 1950).

⁵ [Coos Bay Oyster Co-op. v. State](#), 219 Or. 588, 348 P.2d 39 (1959).

⁶ [McKee v. Gratz](#), 260 U.S. 127, 43 S. Ct. 16, 67 L. Ed. 167 (1922).

End of Document

© 2021 Thomson Reuters. No claim to original U.S. Government Works.